

1 Joel E. Tasca  
Nevada Bar No. 14124  
2 BALLARD SPAHR LLP  
1980 Festival Plaza Drive, Suite 900  
3 Las Vegas, Nevada 89135  
Telephone: 702.471.7000  
4 Facsimile: 702.471.7070  
tasca@ballardspahr.com

5 *Attorney for Defendant*  
6 *Discover Bank*

7 **IN THE UNITED STATES DISTRICT COURT**  
8 **FOR THE DISTRICT OF NEVADA**

9 GLORIA FLORES,

10 Plaintiff,

11 v.

12 DISCOVER BANK, N.A.,

13 Defendant.

CASE NO. 2:21-cv-00492-RFB-EJY

**JOINT STIPULATION FOR  
EXTENSION TO FILE INITIAL  
RESPONSIVE PLEADING**

14  
15 Plaintiff Gloria Flores (“Plaintiff”) and Defendant Discover Bank, N.A.  
16 (“Discover”)<sup>1</sup> stipulate and agree that Discover has up to and including May 12, 2021  
17 to respond to Plaintiff’s Complaint (ECF No. 1), to provide additional time to  
18 investigate Plaintiff’s allegations and for Discover to prepare a response.

19  
20 *[Continued on following page.]*  
21  
22  
23  
24  
25  
26

27 

---

<sup>1</sup> By filing this Stipulation, Discover is not waiving any defense, affirmative or  
28 otherwise, it may have in this matter.

1 This is the first request for an extension, and it is made in good faith and not  
2 for purposes of delay.

3 Dated: April 13, 2021

4 BALLARD SPAHR LLP

KNEPPER & CLARK LLC

5 By: /s/ Joel E. Tasca

By: /s/ Matthew I. Knepper

6 Joel E. Tasca  
7 Nevada Bar No. 14124  
8 BALLARD SPAHR LLP  
1980 Festival Plaza Drive, Suite 900  
Las Vegas, Nevada 89135

Matthew I. Knepper, Esq.  
Miles N. Clark, Esq.  
5510 S. Fort Apache Road, Suite 30  
Las Vegas, Nevada 89148

9 *Attorney for Defendant*  
10 *Discover Bank N.A.*

David Krieger, Esq.  
KRIEGER LAW GROUP, LLC  
2850 W. Horizon Ridge Parkway  
Suite 200  
Henderson, Nevada 89052

*Attorneys for Plaintiff*

11  
12  
13  
14  
15  
16  
17 **ORDER**

18 IT IS SO ORDERED:

19   
20 UNITED STATES MAGISTRATE JUDGE

21 DATED: April 13, 2021  
22  
23  
24  
25  
26  
27  
28

BALLARD SPAHR LLP  
1980 Festival Plaza Drive, Suite 900  
Las Vegas, Nevada 89135  
702.471.7000 FAX 702.471.7070